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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

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14 ENVIRONMENTAL PROTECTION
INFORMATION CENTER,
15 Plaintiff,

16 v.
17 BRIAN NESVIK, in his official capacity as
18 Director of the U.S. Fish and Wildlife Service;
and U.S. FISH AND WILDLIFE SERVICE,
19 Defendants.

CASE NO. 4:25-cv-03049-JST

**JOINT STIPULATION TO AMEND
SCHEDULING ORDER**

Judge: Hon. Jon S. Tigar

Action Filed: April 3, 2025
Trial Date: None

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Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Civil Local Rules 6-2 and 7-12, Plaintiff Environmental Protection Information Center (EPIC); Federal Defendants U.S. Fish and Wildlife Service and Brian Nesvik, in his official capacity as Director of the U.S. Fish and Wildlife Service; and Defendant-Intervenor Green Diamond Resource Company (Green Diamond) (collectively, the Parties) in the above-captioned matter hereby stipulate to and agree as follows:

WHEREAS, in June 2025, the Parties agreed to a schedule for these proceedings, as reflected in the Joint Case Management Plan filed by the Parties on June 17, 2025, *see* ECF No. 27 at 7-8;

WHEREAS, on July 7, 2025, the Court entered a Scheduling Order that adopted the Parties' proposed schedule, ECF No. 30;

WHEREAS, the Parties have met and conferred and agree that certain deadlines reflected in the current Scheduling Order present challenges to the Parties, including the need to review and analyze the voluminous Administrative Record (AR), and counsel for Green Diamond's trial commitments and other scheduling conflicts;

WHEREAS, the Parties contend that good cause exists to extend certain Scheduling Order deadlines as reflected in the schedule set forth below:

Event	Current Deadline	Proposed Schedule	Comments
Motion to complete, supplement or challenge the administrative record; or to seek leave to amend the pleadings	Tuesday, November 18, 2025	Wednesday, January 21, 2026	EPIC's and Green Diamond's counsel shall identify all documents that they propose to complete or supplement the administrative record no later than December 12, 2025 . If Federal Defendants agree to supplement the administrative record, they will provide the other parties with access to the supplemental record no later than January 14, 2026 .

1	Plaintiff's Motion for Summary Judgment	Thursday, November 20, 2025	Friday, January 23, 2026	35 pages
2	Federal Defendants' Combined Cross Motion for Summary Judgment and Opposition	Thursday, January 29, 2026	Thursday, March 26, 2026	35 pages
3	Intervenor's Combined Cross Motion for Summary Judgment and Opposition	Thursday, February 5, 2026	Thursday, April 2, 2026	35 pages
4	Plaintiff's Combined Reply in support of its Motion for Summary Judgment and Opposition to Defendants' Motions for Summary Judgment	Thursday, March 5, 2026	Thursday, April 30, 2026	45 pages
5	Federal Defendants' Reply	Thursday, April 2, 2026	Thursday, May 28, 2026	30 pages
6	Intervenor's Reply	Thursday, April 9, 2026	Thursday, June 4, 2026	20 pages
7	Hearing on the Cross Motions for Summary Judgment	At the Court's convenience	At the Court's convenience	N/A

WHEREAS, consistent with the Order entered by the Court on July 7, 2025, ECF No. 30, and the Parties' Joint Case Management Statement, ECF No. 27, the briefing deadlines for the cross-motions for summary judgment shall be vacated in the event any of the following motions is timely filed: a motion to augment or otherwise challenge the contents of the administrative record, a motion to dismiss, or a motion to amend the pleadings. Within 14 days of the filing of any such motion, the parties are ordered to meet and confer and submit a proposed briefing schedule for the pending motion and corresponding changes to the summary judgment briefing schedule.

NOW, THEREFORE, the Parties respectfully ask that the Court enter an order extending certain deadlines in this matter in accordance with the proposed schedule set forth above.

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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4 Date: September 30, 2025
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JON S. TIGAR
United States District Judge

7 Respectfully submitted,
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Dated: September 26, 2025
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PAUL HASTINGS LLP

10 */s/ Christopher J. Carr*
11 CHRISTOPHER J. CARR

12 Attorneys for Defendant-Intervenor
13 GREEN DIAMOND RESOURCE COMPANY

14 ADAM R.F. GUSTAFSON
15 Acting Assistant Attorney General
16 United States Department of Justice
17 Environment & Natural Resources Division

18 */s/ Erika Furlong **
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20 Attorneys for Federal Defendants
21 U.S. FISH AND WILDLIFE SERVICE and
22 BRIAN NESVIK

23 WESTERN ENVIRONMENTAL LAW
24 CENTER

25 */s/ Sangye Ince-Johannsen **
26 SANGYE INCE-JOHANNSEN

27 Attorneys for Plaintiff
28 ENVIRONMENTAL PROTECTION
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* Signature added with consent of signor.